

**SWRCB SFY20 EOY
Water Program Assessment
SFY21 Priorities
October 2020**

Enforcement & Compliance

Clean Water Act

- AzDEQ will continue to prioritize meeting their workplan commitments for SFY21. Additionally, AzDEQ will finish addressing multiple SRF Round 4 recommendations, which had several SFY20 milestones extended into SFY21. The multiple SRF Round 4 recommendations can be broadly categorized as improving accuracy in data management, providing comprehensive NPDES inspector training for all the authorized programs, and revising the AzDEQ Compliance Handbook.
- In SFY21, AzDEQ will continue compliance monitoring activities with a goal of meeting all field inspection commitments. If field inspections are not performed because of COVID-19, AzDEQ should make efforts to assess compliance using alternative tools and track and share those efforts with EPA at mid-year and end-of-year.

Drinking Water

- The priorities for drinking water enforcement are to continue addressing systems in violation of the arsenic MCL and systems with ETT scores of 11 or higher. Also, EPA's PWSS National Compliance Initiative has a focus on evaluating compliance at large community water systems. EPA will work with AzDEQ to evaluate the sanitary survey reports for up to 25 public water systems. EPA will accompany AzDEQ in a couple of large community water system inspections, conditions permitting.

Surface Water

Water Quality Standards

- AzDEQ and EPA will meet to discuss status and path forward for WQS submittal.
- Completion of the Rivers and Streams N-STEPS project and WQS creation for nutrients by July 2021.
- Early engagement with EPA on the planned 2022 WQS Triennial Review and standards revisions, improve efficiency and effectiveness of the Triennial Review and WQS adoption and revision process. EPA and AzDEQ have agreed to work together to identify potential changes to AzDEQ's process. Potential solutions include separate WQS and Triennial Review actions, adopting smaller more focused WQS packages, and incorporating early engagement steps into AzDEQ's process and WQS workflow.

Water Quality Monitoring

- Continue core monitoring efforts including coordination across water quality units and effectively flowing data into WQX.

- Complete key workplan milestones including the Hassayampa River BMP effectiveness evaluation, Streamflow Duration Assessment Methods surveys on up to 80 sites, data training for staff, and the Arizona Fish Consumption survey.

Integrated Report and TMDL

- AzDEQ to follow-up with EPA on how the KOUI strategy supports CWA programs, including TMDLs.
- Submission of the Pinto Creek TMDL to EPA in December 2020.
- AzDEQ and EPA to reach agreement on the path forward for completing both the 2020 and 2022 IRs.

AzPDES Permitting

- Addressing uncertainties around CWA jurisdiction is a critical priority for the AzPDES program. These challenges are larger in scope than just the AzPDES program, but since a large portion of the funds for the AzPDES program are based on permit fees the uncertainties around the NWPR are a crucial challenge for the program.
- EPA is in the process of conducting a Permit Quality Review (PQR) of the AzPDES program, and a report with an outline of action items will be prepared over the next few months. EPA also reviewed action items from the previous PQR and noted that all critical (Category 1) action items have been addressed except for updating the pretreatment regulations to come into compliance with the streamlining rule. We acknowledge that this may not happen soon due to the rulemaking moratorium in place in Arizona.

Development of CWA § 404 Permitting Program

- AzDEQ plans to develop a state program for non-NWPR waters using Multi-Purpose Grant (MPG) funding. Through the MPG funding, EPA will continue to oversee workplan deliverables on state program development to ensure they are timely. Also, NWPR training is a high priority to ensure the protection of federal waters. EPA recommends that AzDEQ consider how information developed to date through the Workplan on program assumption will be utilized for the development of the State's Program for non-NWPR waters.

CWA § 401 Water Quality Certification Program

- With the new § 401 rule and re-issuance of the Army Corps Nationwide Permits, EPA recommends that EPA and AzDEQ increase coordination to support understanding of the new federal regulations and ensure compliance with water quality requirements. Further, EPA asks that AzDEQ identify training needs for AzDEQ staff on the new § 401 rule and water quality certification that could be provided by EPA

Nonpoint Source and Infrastructure

Nonpoint Source

- The Watershed Improvement Unit plans to focus on watersheds impaired by metals.

US – Mexico Border

- AzDEQ will continue to work with municipalities on both sides of the border to improve utility sustainability and capacity. AzDEQ will remain engaged in the Naco diagnostic study to identify a long-term solution to prevent transboundary sewage flows in Naco. Finally, AzDEQ will continue to support the implementation of the IOI improvement project in Nogales.

DW and CW State Revolving Fund Programs

- In 2021, EPA plans to work with AzDEQ, WIFA, and the Region 9 Environmental Finance Center to organize an Arizona water funding forum designed to improve understanding of SRF and other water project funding sources and strategies, and hopefully increase interest among a wider array of project proponents in applying for SRF funding support.

Groundwater and Drinking Water

Ground Water

- Continue communication on permit-related activities between the UIC and APP permit staff.
- Submit UIC Primacy Package in late 2021.
- Improve communications and program coordination and support by scheduling quarterly calls between David Albright, Groundwater Protection Section, and Naveen Savarirayan, Ground Water Value Stream Unit Manager.

Public Water Systems Supervision

- AzDEQ to submit final primacy revisions packages for Stage 1 and Stage 2 Disinfection Byproduct Rules.
- AzDEQ to provide training to state/county program staff and water utilities on the LCRR.
- AzDEQ to provide training to and assess performance by Maricopa County Health in addressing priority findings from the delegated program review to include implementation of the LCR, enforcement of drinking water regulations, and correction of significant deficiency findings.
- AzDEQ to fill key vacancies in the Compliance Unit.
- AzDEQ to finalize the Pima County Program Review Report and Corrective Action Plan to address review findings/recommendations.